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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES ANTIMICROBIALS DIVISION

Wednesday, May 17, 2006

SUBJECT: PRODUCT CHEMISTRY REVIEW OF:

Reg. No. Or File Symbol: 3008-90 Manufacturing-use [] OR DP Barcode: D327924

End-use Product [X]

TO:

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Product Formulation from Label

Active Ingredient(s)	% by wt.
Copper carbonate	35.37
Didecyl dimethyl ammonium carbonate and	
didecyl dimethyl ammonium bicarbonate	12.80
Other Ingredients:	51,83
Total:	100.0%

PRODUCT CHEMISTRY REVIEW

1) **BACKGROUND:** Osmose, Inc., has submitted a storage stability and corrosion characteristic study to support the product chemistry requirements for "ORD-X372". The study was conducted by Osmose, Inc. The MRID Number is 467829-01.

2) FINDINGS:

- a) The product's percentage of active ingredients remained within the upper and lower certified limits during the 12-month study. The percentage of active ingredients stayed within the UCL and LCLs of the declared percentage of active of the label declaration.
- There were no signs of degradation or deterioration in any of the sample containers during the study.

3) RECOMMENDATIONS:

- (a) The storage stability study is acceptable.
- (b) The degradation study is acceptable.

For this assessment, the percentages of active ingredients should be as follows:

	Copper Carbonate	Quat
Nominai	20.1%	12.80%
Upper Certified Limit	20.703%	13.44%
Lower Certified Limit	19.497%	12.16%

The results of this assay were:

Time point (Months)	% Copper Carbonate	% Quat
0	20.20	12.62
3	19.88	12.74
6	20.33	12.09
9	19.95	12.64
12	20.11	12.58